

State of Missouri
Office of Secretary of State

Case No. AP-09-18

IN THE MATTER OF:

SAFE HARBOR FINANCIAL LLC;
TRAVIS RAY WINNETT;
AND
ERRON L. WRIGHT, JR.,

Respondents.

Serve Safe Harbor Financial, LLC at:
702 Wayne Avenue
Neosho, MO 64850

Serve Travis Ray Winnett at:
910 Sherry Lea Drive
Neosho, MO 64850

Serve Erron L. Wright, Jr. at:
702 Wayne Avenue
Neosho, MO 64850

**ORDER TO CEASE AND DESIST AND ORDER TO SHOW
CAUSE WHY CIVIL PENALTIES AND COSTS SHOULD NOT
BE IMPOSED**

On May 6, 2009, the Enforcement Section of the Securities Division of the Office of Secretary of State (the "Enforcement Section"), through its Chief Registration Counsel Nathan Soendker, submitted a Petition for Order to Cease and Desist and Order to Show Cause Why Civil Penalties and Costs Should Not Be Imposed. After reviewing the petition, the Commissioner issues the following findings of fact, conclusions of law and order:

I. FINDINGS OF FACT

1. Safe Harbor Financial LLC ("Safe Harbor"), is a Missouri limited liability company with an address of 702 Wayne Avenue, Neosho, Missouri 64850. Safe Harbor was organized by Erron L. Wright, Jr. ("Wright") on August 27, 2007, to engage in insurance premium financing. Wright is also Safe Harbor's registered agent. Safe Harbor is a licensed insurance producer in Missouri.
2. Travis Ray Winnett ("Winnett") is a Missouri resident with an address of 19101 Sherry Lea Drive, Neosho, Missouri 64850. Winnett is the President of Safe Harbor. Winnett is licensed in Missouri as an insurance producer with Safe Harbor.
3. Wright is an individual with an address of 702 Wayne Avenue, Neosho, Missouri

64850. From July 1996 through October 23, 2007, Wright was a registered securities agent in Missouri associated with Mutual of Omaha Investor Services, Inc.

4. Prior to August 30, 2007, Winnett was doing business in Oklahoma as American Liberty Insurance & Financial Services ("American Liberty") and associated with LightHouse Marketing, Inc. On or about August 30, 2007, Winnett, American Liberty and LightHouse Marketing, Inc., entered into a consent order with the Oklahoma Department of Securities acknowledging that they were engaged in the offer and sale of insurance premium funding plans through which participants were promised returns of eight percent (8%) per year or ten percent (10%) per year. Through the consent, Winnett acknowledged that these insurance premium financing plans were securities. Winnett consented to the entry of a final order and permanent injunction. Winnett agreed to return all funds to program participants and Winnett's assets (frozen on June 29, 2007) would remain frozen until all participants were reimbursed.
5. At the time Winnett consented to stop his activities in Oklahoma and make restitution to Oklahoma participants, he and Wright had already established Safe Harbor in Missouri for the stated purpose of engaging in insurance premium financing.
6. On August 29, 2007, Winnett opened a business checking account no. 73857 at Community Bank and Trust in Missouri ("Community Bank") in the name of Safe Harbor. Winnett and another individual, Charles Draper, were signatories on this account.
7. On or about October 26, 2007, Wright met with two senior Missouri residents ("MR1 and MR2"), about cashing in some existing investments and placing the money in an investment that, according to Wright, could earn them eight percent (8%) interest paid annually. Wright told MR1 and MR2 that by putting the investment in an IRA, they would not have to pay taxes until the money was taken out of the IRA.
8. According to MR1 and MR2, they had known Wright for approximately eleven (11) years and trusted him. Wright did not provide MR1 and MR2 with any specific information on how their money would be invested nor were any risks discussed. Wright told MR1 and MR2 that he could get them a better return than their existing investments and had them sign some documents.
9. Based solely on Wright's representations, in October of 2007, MR1 and MR2 obtained a cashier's check in the amount of seventy thousand dollars (\$70,000) payable to Trust Company of the Pacific¹ as instructed by Wright.
10. During the course of its investigation, the Enforcement Section obtained copies of the following documents presented to MR1 and MR2 for signing:
 - i. Depositor/Lender Agreement issued by Safe Harbor;
 - ii. Self-Directed Account Application with Trust Company of the Pacific; and
 - iii. General/Direction of Investment to Trust Company of the Pacific.
11. The Depositor/Lender Agreement issued by Safe Harbor stated, in part, as follows:

“Safe Harbor Financial LLC with offices in Neosho, Missouri is a licensed Insurance Premium Finance Company

WHEREAS, Lender [MR1 and MR2] . . . has reviewed and approves and adopts the criteria set forth in this agreement to loan funds for the operations of Safe Harbor Financial LLC

Lender understands that the loan deposit of \$70,000 . . . is for a period of 54 months at a fixed rate . . . of 8 percent with interest only payments to Lender paid . . . [annually].”

12. The Self-Directed Account Application with Trust Company of the Pacific was to establish an IRA with Trust Company of the Pacific for the benefit of MR1.
13. The General/Direction of Investment to Trust Company of the Pacific directed that the funds be deposited in bank account # 073857 at Community Bank & Trust in the name of Safe Harbor.
14. The contents of the documents were not explained to MR1 or MR2. Despite signing the documents provided, neither MR1 nor MR2 understood that they were loaning money to Safe Harbor. They did not receive copies of the documents they signed and were not aware where their money was invested until contacted by an investigator with the Enforcement Section. Wright never disclosed the risks or other material information of the investment to MR1 and MR2.
15. On November 5, 2007, sixty nine thousand seven hundred fifty dollars (\$69,750) was wired to Safe Harbor’s account at Community Bank from the Trust Company of the Pacific.
16. In February 2008, MR1 and MR2 received payouts from prior investments with American National Insurance Company in the amount of twenty seven thousand seven hundred sixty-three dollars and seventy nine cents (\$27,763.79) each, for a total of fifty five thousand five hundred twenty seven dollars and fifty eight cents (\$55,527.58). They wanted to reinvest this money for their retirement.
17. On or about February 25, 2008, MR1 and MR2 met with Wright about investing these funds. Again, Wright told MR1 and MR2 that he could get them eight percent (8%) interest paid annually. No risks were discussed and no details of the investment were given to MR1 and MR2.
18. During the course of its investigation, the Division obtained copies of the following documents presented to MR1 and MR2 on or about February 25, 2008, by Wright:
 - i. Loan Agreement and Promissory Note; and
 - ii. Unsecured Promissory Note.
19. The Loan Agreement and Promissory Notes signed by MR1 and MR2 provide, in part, as follows:

“Safe Harbor Financial . . . with its principal place of business at 702 Wayne Avenue, Neosho, Missouri 64850 . . . engages in the business of

premium financing of life insurance policies for insureds residing within the state of Missouri.

. . . The term of the loan shall be 66 months . . . The Note will bear simple interest on the total principal amount at a rate of 8 percent per annum (8%).

. . . Principal and interest of this Note shall together be paid in a single payment on the _____ Day of _____, 20____.”

20. MR1 and MR2 endorsed, and gave to Wright, four checks from American National Insurance Company, all dated February 11, 2008, totaling fifty five thousand, five hundred twenty seven dollars and fifty eight cents (\$55,527.58). These checks were deposited in Safe Harbor’s checking account at Community Bank on February 25, 2008.
21. MR1 and MR2 told an investigator with the Enforcement Section that they are not accredited investors and have never discussed their financial situation with Wright. Their only source of income is social security benefits. The monies handed over to Wright and Safe Harbor represent their entire savings.
22. On or about November 2, 2007, Winnett met with two Missouri residents (“MR3 and MR4”) about investing with Safe Harbor. Winnett promised MR3 and MR4 a return of fifteen percent (15%) interest paid annually. Winnett never disclosed the risks or other material information of the investment to MR3 and MR4.
23. During the course of its investigation, the Division obtained copies of the following documents presented to MR3 and MR4 by Winnett:
 - i. Depositor/Lender Agreements issued by Safe Harbor;
 - ii. Self-Directed Account Application with Trust Company of the Pacific; and
 - iii. General/Direction of Investment to Trust Company of the Pacific.
24. The Depositor/Lender Agreement issued by Safe Harbor to MR3 and MR4 was essentially the same as described in Paragraph 11 above, with the following exceptions:
 - i. MR3 invested thirty five thousand, fourteen dollars and eighty cents (\$35,014.80) for sixty-six (66) months at a fixed interest rate of fifteen percent (15%) paid at the end of the contract term; and
 - ii. MR4 invested thirty one thousand, seven hundred forty-eight dollars and twenty five cents (\$31,748.25) for sixty-six (66) months at a fixed interest rate of fifteen percent (15%) paid at the end of the contract term.
25. Winnett instructed MR3 and MR4 to complete the “Self-Directed Account Applications” to open IRA accounts with the Trust Company of the Pacific and direct their investments to be sent to bank account # 073857 at Community Bank in the name of Safe Harbor.

26. MR3 and MR4 rolled over funds invested with American Funds Service Company and Allianz to the Trust Company of the Pacific which was subsequently deposited in Safe Harbor's account at Community Bank.
27. On December 27, 2007, Trust Company of the Pacific wired thirty five thousand, fourteen dollars and eighty cents (\$35,014.80) and thirty one thousand, seven hundred forty-eight dollars and twenty five cents (\$31,748.25) to the Safe Harbor checking account at Community Bank.
28. MR3 and MR4 told an investigator with the Division that they are not accredited investors and have never discussed their financial situation with Winnett.
29. On or about February 12, 2008, Wright met with a 63 year-old Missouri resident ("MR5") at her home in Neosho, Missouri, to solicit an investment with Safe Harbor. MR5 had twenty thousand dollars (\$20,000) in a self-directed IRA. Wright told MR5 that she could earn eight percent (8%) interest by investing the money with Safe Harbor. Wright never disclosed the risks or other material information of the investment to MR5.
30. MR5 still works full time in a manufacturing plant and earned approximately twenty one thousand dollars (\$21,000) in 2007. MR5 told Wright that she needed to have monthly income from the investment.
31. Because MR5 told Wright that she needed monthly income, Wright told MR5 that she would receive a payment in the amount of one hundred thirty-three dollars and thirty three cents (\$133.33) each month from Safe Harbor. The first payment arrived in April 2008. MR5 has not received a payment from Safe Harbor since November 2008.
32. MR5 was given a Loan Agreement and Promissory Note to sign, essentially the same as the document described in Paragraph 19, above, except that it provided that MR5 was lending twenty thousand dollars (\$20,000) at eight percent (8%) interest for fifty-four (54) months stating that principal and interest would be paid on August 15, 2012.
33. Wright instructed MR5 to complete an Agent Authorization form and an Authorization to Pay IRA Funds to an Escrow Agent or Funding Company instructing Provident Group to pay twenty thousand dollars (\$20,000) to Safe Harbor.
34. Instead of sending the money directly to Safe Harbor, Provident sent the money to MR5, who then wrote a check dated February 12, 2008, to Safe Harbor in the amount of twenty thousand dollars (\$20,000). The check was deposited in the Safe Harbor's account at Community Bank on February 14, 2008.
35. On or about October 11, 2007, Wright offered and sold a promissory note essentially the same as the Agreement described in paragraph 10, above, to another Missouri resident ("MR6"), except that it provided that MR6 would invest one hundred twenty five thousand, eight hundred thirty dollars and sixty three cents (\$125,830.63) with Safe Harbor at eight percent (8%) interest to be paid annually. MR6's money was in a Schaeffler USA Savings Retirement Plan ("Schaeffler"). Wright never disclosed the risks or other material information of the investment to MR6.
36. Wright instructed MR6 to complete a "Self-Directed Account Application" to open an

IRA account with the Trust Company of the Pacific and direct the investment to be sent to bank account # 073857 at Community Bank in the name of Safe Harbor.

37. On or about October 16, 2007, Schaeffler sent a check in the amount of one hundred twenty five thousand, eight hundred thirty dollars and sixty three cents (\$125,830.63) to Trust Company of the Pacific FBO MR6.
38. On November 14, 2007, Trust Company of the Pacific wired one hundred twenty five thousand, eight hundred thirty dollars and sixty three cents (\$125,830.63) to the Safe Harbor checking account at Community Bank & Trust.
39. As a result of its investigation, the Enforcement Section learned that, over a six month period, at least two hundred fifteen thousand dollars (\$215,000) was transferred to Winnett's personal checking account at Community Bank from Safe Harbor's account at Community Bank or was taken by Winnett from Safe Harbor's checking account as cash. In November 2007, Winnett wrote himself a check for fifty thousand dollars (\$50,000).
40. As a result of its investigation, the Enforcement Section learned that at least twenty five thousand dollars (\$25,000) of investor's money was transferred to Wright from the Safe Harbor account as compensation for the sale of promissory notes to investors.
41. A check of the records maintained by the Missouri Commissioner of Securities confirmed that:
 - a. there is no effective registration statement or notice filing indicating status as a "federal covered security" for the securities offered and sold by Respondents; and
 - b. neither Winnett nor Wright were registered securities agents in Missouri at the time that the securities were offered and sold in the State of Missouri.
42. In connection with the offer and/or sale of the securities in Missouri, Respondents failed to state or provide investors with the following material information:
 - a. That the securities were not registered for sale in or from the state of Missouri;
 - b. That at the time of offer and sale, neither Winnett nor Wright were registered as securities agents in Missouri;
 - c. The existence of the injunction and order issued by the state of Oklahoma against Winnett;
 - d. That Winnett owed restitution to Oklahoma investors;
 - e. Any risks associated with the securities being offered and sold;
 - f. Any current audited financial statements, income statements, balance sheet and cash flow statements for Safe Harbor;
 - g. That Wright and Winnett would receive compensation from the sales to

investors; and

- h. That Winnett received a fifty thousand dollar (\$50,000) “loan/advance” from investors’ money.

II. STATUTORY PROVISIONS

43. Section 409.6-601(a), RSMo. (Cum. Supp. 2008), provides that the Missouri Securities Act of 2003 “shall be administered by the commissioner of securities who shall be appointed by and under the direction of the secretary of state”
44. Section 409.1-102(1), RSMo. (Cum. Supp. 2008), defines “agent” as an individual who “represents an issuer in effecting or attempting to effect purchases or sales of the issuer’s securities.”
45. Section 409.1-102(26), RSMo. (Cum. Supp. 2008), defines “sale” to include, “every contract of sale, contract to sell, or disposition of, a security or interest in a security for value.” That same section defines “offer to sell” as “every attempt or offer to dispose of, or solicitation of an offer to purchase, a security or interest in a security for value.”
46. Section 409.1-102(28), RSMo. (Cum. Supp. 2008), includes “notes” and “evidence of indebtedness” within the definition of a security.
47. Section 409.3-301, RSMo (Cum. Supp. 2008), states:

It is unlawful for a person to offer or sell a security in this state unless:

- (1) The security is a federal covered security;
- (2) The security, transaction, or offer is exempted from registration under Sections 409.2-201 to 409.2-203; or
- (3) The security is registered under this act.

48. Section 409.4-402, RSMo. (Cum. Supp. 2008), states:

It is unlawful for an individual to transact business in this state as an agent unless the individual is registered under this act as an agent or is exempt from registration as an agent under subsection (b).

49. Section 409.4-402(d), RSMo. (Cum. Supp. 2008), states:

It is unlawful for any broker-dealer or an issuer engaged in offering, selling, or purchasing securities in this state, to employ or associate with an agent who transacts business in this state on behalf of broker-dealers or issuers unless the agent is registered under subsection (a) or exempt from registration under subsection (b).

50. Section 409.5-501, RSMo. (Cum. Supp. 2008), states:

It is unlawful for a person, in connection with the offer, sale, or purchase of a security, directly or indirectly:

- (1) employ a device, scheme, or artifice to defraud;
- (2) To make an untrue statement of a material fact or to omit state a material fact
necessary in order to make the statement made, in the light of the circumstances
under which it is made, not misleading; or
- (3) To engage in an act, practice, or course of business that operates or would
operate as a fraud or deceit upon another person.

51. Section 409.6-604(a), RSMo. (Cum. Supp. 2008), states:

If the commissioner determines that a person has engaged, is engaging, or is about to engage in an act,
practice, or course of business constituting a violation of this act or a rule adopted or order issued under this
act . . . the commissioner may:

- (1) Issue an order directing the person to cease and desist from engaging in the act, practice, or course of business or to take other action necessary and appropriate to comply with this act;
- (2) Issue an order denying, suspending, revoking, or conditioning the exemptions for a broker-dealer under section 409.4-401(b)(1)(D) or (F) or an investment adviser under section 409.4-403(b)(1)(C); or
- (3) Issue an order under section 409.2-204.

52. Section 409.6-604(b), RSMo. (Cum. Supp. 2008), states:

An order under subsection (a) [of Section 409.6-604, RSMo.] is effective on the date of issuance . . . If a person subject to the order does not request a hearing and none is ordered by the commissioner within thirty days after the date of service of the order, the order becomes final as to that person by operation of law.

53. Section 409.6-604(c), RSMo. (Cum. Supp. 2008), states:

If a hearing is requested or ordered pursuant to subsection (b) [of Section 409.6-604, RSMo.], a hearing before the commissioner must be provided. A final order may not be issued unless the commissioner makes findings of fact and conclusions of law in a record in accordance with the provisions of chapter 536, RSMo, and procedural rules promulgated by the commissioner. The final order may make final, vacate, or modify the order issued unless under subsection (a) [of Section 409.6-604, RSMo.].

54. Section 409.6-604(d), RSMo. (Cum. Supp. 2008), states:

In a final order under subsection (c) [of Section 409.6-604, RSMo.], the commissioner may impose a civil penalty up to one thousand dollars (\$1,000) for a single violation or up to ten thousand dollars (\$10,000) for more than one violation.

55. Section 409.6-604(e), RSMo.(Cum. Supp. 2008), states:

In a final order, the commissioner may charge the actual cost of an investigation or proceeding for a violation of this act or a rule adopted or order issued under this act. These funds may be paid into the investor education and protection fund.

III. CONCLUSIONS OF LAW

Multiple Violations of Offering and Selling Unregistered Securities

56. Paragraphs 1 through 55 are incorporated by reference as though fully set forth herein.
57. The investments offered and sold by the Respondents come under the definition of “securities” contained in Section 409.1-102(28), RSMo. (Cum. Supp. 2008).
58. The Respondents’ actions in offering and selling securities in Missouri satisfy the definition of “offer to sell” and “sale” under Section 409.1.102(26), RSMo. (Cum. Supp. 2008).
59. At all times relevant, records maintained by the Missouri Commissioner of Securities contained no registration or notice filing indicating status as a “federal covered security” for any security allegedly offered or sold by Respondents.
60. The Respondents violated Section 409.3-301, RSMo. (Cum. Supp. 2008), when they offered and sold securities in Missouri without the securities being (1) a federal-covered security, (2) exempt from registration under Sections 409.2-201 to 409.2-203, RSMo. (Cum. Supp. 2008), or (3) registered under the Missouri Securities Act of 2003.
61. Respondents’ actions in offering or selling unregistered securities constitute an illegal act, practice, or course of business and thus such actions are subject to the commissioner’s authority under Section 409.6-604(a), RSMo. (Cum. Supp. 2008).

Multiple Violations of Transaction Business as an Unregistered Agent by Wright and Winnett

62. Paragraphs 1 through 55 are incorporated by reference as though fully set forth herein.
63. At all times relevant, records maintained by the Missouri Commissioner of Securities contained no registration or granted exemption for Respondents Wright or Winnett to transact business as issuer agents in the State of Missouri.

64. Respondents Wright and Winnett violated Section 409.4-402(a), RSMo. (Cum. Supp. 2008), when they offered or sold securities in the State of Missouri without being registered or exempt from registration as agents.
65. Respondent Wright's and Respondent Winnett's actions in transacting business as unregistered agents constitute an illegal act, practice, or course of business and such actions are therefore subject to the commissioner's authority under Section 409.6-604(a), RSMo. (Cum. Supp. 2008).

**Multiple Violations by Respondent Safe Harbor of
Associating with Unregistered Agents**

66. Paragraphs 1 through 55 are incorporated by reference as though fully set forth herein.
67. Respondent Safe Harbor created the securities offered and sold in this matter and are thus the issuer of these securities as that term is defined under Section 409.1-102(17), RSMo. (Cum. Supp. 2008).
68. As the issuer, Respondent Safe Harbor employed Wright and Winnett who sold the issuer's securities in Missouri on numerous occasions. These solicitations constitute transacting business in the State of Missouri.
69. Respondent Safe Harbor has not registered any issuer agents in the State of Missouri.
70. Respondent Safe Harbor violated Section 409.4-402(d), RSMo. (Cum. Supp. 2008), when it employed or associated with unregistered agents who transacted business in the State of Missouri.
71. Employing or associating with unregistered agents who transact business in this state constitutes an illegal act, practice, or course of business and such action is therefore subject to the commissioner's authority under Section 409.6-604(a), RSMo. (Cum. Supp. 2008).

**Multiple Violations of Omitting to State Material
Facts in Connection with the Sale of a Security**

72. Paragraphs 1 through 55 are incorporated by reference as though fully set forth herein.
73. In connection with the offer and sale of securities, Respondents omitted to state material facts necessary in order to make statements made, in light of the circumstances under which they were made, not misleading, including, but not limited to:
 - a. That the Respondents could not lawfully offer or sell securities in or from the State of Missouri;
 - b. That the securities were not registered for sale in or from the state of Missouri;
 - c. That at the time of offer and sale, neither Winnett nor Wright were registered as securities agents in Missouri;

- d. The existence of the injunction and order issued by the state of Oklahoma against Winnett;
 - e. That Winnett owed restitution to Oklahoma investors;
 - f. Any risks associated with the securities being offered and sold;
 - g. Any current audited financial statements, income statements, balance sheet and cash flow statements for Safe Harbor;
 - h. That Wright and Winnett would receive compensation from the sale of securities to investors; and
 - i. That Winnett received a fifty thousand dollar (\$50,000) “loan/advance” from investors’ money.
74. Respondents’ actions in omitting to state a material fact necessary to make statements made not misleading, in connection with the offer, sale or purchase of a security, constitute an illegal act, practice, or course of business and thus such actions are subject to the commissioner’s authority under Section 409.6-604(a), RSMo. (Cum. Supp. 2008).
75. This order is in the public interest and consistent with the purposes intended by the Missouri Securities Act of 2003. See Section 409.6-605(b), RSMo. (Cum. Supp. 2008).

IV. ORDER

NOW THEREFORE, it is hereby ordered that Respondents, their agents, employees and servants, and all other persons participating in or about to participate in the above-described violations with knowledge of this Order are prohibited from:

- A. offering or selling any securities as defined by Section 409.1-102(28), RSMo. (Cum. Supp. 2008), in the State of Missouri unless those securities are registered with the Securities Division of the Office of the Secretary of State in accordance with the provisions of Missouri Securities Act of 2003;
- B. transacting business as an unregistered agent in violation of Section 409.4-402, RSMo. (Cum. Supp. 2008);
- C. employing an unregistered agent in violation of Section 409.4-402, RSMo. (Cum. Supp. 2008); and
- D. violating or materially aiding in any violation of Section 409.5-501, RSMo. (Cum. Supp. 2008), by, in connection with the offer or sale of securities, making an untrue statement of a material fact or omitting to state a material fact necessary in order to make a statement made, in the light of the circumstances under which it is made, not misleading.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2008), the Commissioner will determine whether to grant the Enforcement Section’s petition for an imposition of a civil penalty of up to ten thousand dollars (\$10,000) against

each Respondent individually for multiple violations of Section 409.3-301, RSMo. (Cum. Supp. 2008), in a final order, unless Respondents request a hearing and show cause why the penalty should not be imposed.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2008), the Commissioner will determine whether to grant the Enforcement Section's petition for an imposition of a civil penalty of up to ten thousand dollars (\$10,000) against each of Respondent Wright and Respondent Winnett for multiple violations of Section 409.4-402(a), RSMo. (Cum. Supp. 2008), in a final order, unless Respondents Wright and Winnett request a hearing and show cause why the penalty should not be imposed.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2008), the Commissioner will determine whether to grant the Enforcement Section's petition for an imposition of a civil penalty of up to ten thousand dollars (\$10,000) against Respondent Safe Harbor for multiple violations of Section 409.4-402(d), RSMo. (Cum. Supp. 2008), in a final order, unless Respondent Safe Harbor requests a hearing and shows cause why the penalty should not be imposed.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2008), the Commissioner will determine whether to grant the Enforcement Section's petition for an imposition of a civil penalty of up to ten thousand dollars (\$10,000) against each Respondent for multiple violations of Section 409.5-501(2), RSMo. (Cum. Supp. 2008), in a final order, unless Respondents request a hearing and show cause why the penalty should not be imposed.

IT IS FURTHER ORDERED that, as the Enforcement Section has petitioned for an award for the costs of the investigation against Respondents in this proceeding, the Commissioner will issue a final order, pursuant to Section 409.6-604(e), RSMo. (Cum. Supp. 2008), awarding an amount to be determined after review of evidence submitted by the Enforcement Section, unless Respondents request a hearing and show cause why such an award should not be made.

SO ORDERED:

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY,
MISSOURI THIS 18TH DAY OF MAY, 2009.

ROBIN CARNAHAN
SECRETARY OF STATE

(Signed/Sealed)
MATTHEW D. KITZI
COMMISSIONER OF SECURITIES



State of Missouri
Office of Secretary of State

Case No. AP-09-18

IN THE MATTER OF:

SAFE HARBOR FINANCIAL LLC;
TRAVIS RAY WINNETT;
AND
ERRON L. WRIGHT, JR.,

Respondents.

Serve: Safe Harbor Financial, LLC at:
702 Wayne Avenue
Neosho, MO 64850

Serve: Travis Ray Winnett at:
910 Sherry Lea Drive
Neosho, MO 64850

Serve: Erron L. Wright, Jr. at:
702 Wayne Avenue
Neosho, MO 64850

NOTICE

TO: Respondents and any unnamed representatives aggrieved by this Order:

You may request a hearing in this matter within thirty (30) days of the receipt of this Order pursuant to Section 409.6-604(b), RSMo. (Cum. Supp. 2007), and 15 CSR 30-55.020.

Within fifteen (15) days after receipt of a request in a record from a person or persons subject to this order, the Commissioner will schedule this matter for a hearing.

A request for a hearing must be mailed or delivered, in writing, to:

**Matthew D. Kitz, Commissioner of Securities
Office of the Secretary of State, Missouri
Kirkpatrick State Information Center
600 West Main Street, Room 229**

Jefferson City, Missouri, 65102.

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of May, 2009, copies of the foregoing Order and Notice in the above styled case was **mailed by certified U.S. Mail, postage prepaid, to:**

Safe Harbor Financial, LLC
702 Wayne Avenue
Neosho, MO 64850

Travis Ray Winnett
910 Sherry Lea Drive
Neosho, MO 64850

Erron L. Wright, Jr.
702 Wayne Avenue
Neosho, MO 64850

And hand delivered to:

Nathan Soendker
Chief Registration Counsel
Securities Division

John Hale, Specialist

¹Trust Company of the Pacific purports to be a Trust Company with an address at 1055 Whitney Ranch Drive, Henderson, NV 89014.